

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**IN RE:**

**Misc No. 25-50008**  
**Honorable Susan K.**  
**DeClercq**

Thirty-One Thousand Four Hundred Sixty-One  
Dollars and Seventy-Five Cents (\$31,461.75) in  
U.S. Currency (24-DEA-715074);

Six Thousand Two Hundred Twenty-Four Dollars and  
Eighty-Seven Cents (\$6,224.87) in U.S. Currency  
(24-DEA-715077);

Miscellaneous Jewelry, Value: \$71,165.00  
(24-DEA-715866)

Defendants *in Rem*.

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**Stipulated Order to Extend United States' Time to File a  
Forfeiture Complaint and to Toll the Civil Filing Deadline**

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It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and Michael Bennett, by and through his attorney, Steven Fishman, as follows:

1. On September 4, 2024, law enforcement officers seized Six Thousand Two Hundred Twenty-Four Dollars and Eighty-Seven Cents (\$6,224.87) in U.S. Currency (24-DEA-715077) from Michael Bennett during a traffic stop.

2. On September 5, 2024, law enforcement officers seized the following property during a search of Michael Bennett's residence:

- Thirty-One Thousand Four Hundred Sixty-One Dollars and Seventy-Five Cents (\$31,461.75) in U.S. Currency (24-DEA-715074); and
- Miscellaneous Jewelry, Value: \$71,165.00, consisting of (1) 10kt white gold franco link chain necklace, 10kt white gold rectangular pendant with diamonds; (1) 14kt yellow gold diamond bracelet set (87) round brilliant cut diamonds; (1) 10kt yellow gold franco link necklace, (1) 10kt yellow gold rectangular pendant set with round brilliant cut diamonds; (1) 18kt white gold Rolex Day-Date 40 automatic watch Dark Rhodium stripe motif dial, serial number JA500130, Model 228239; (1) Counterfeit Rolex Submariner automatic watch; and (1) 18kt yellow gold and stainless steel Rolex DateJust Silver "sunray" finish dial, serial number 8L6732K7 (24-DEA-715684)

(\$6,224.87 in U.S. Currency, \$31,461.75 in U.S. Currency, and Miscellaneous Jewelry, Value: \$71,165.00 collectively referred to herein as the "Property").

3. The Parties acknowledge and stipulate that the Drug Enforcement Administration ("DEA") provided notice as required by 18 U.S.C. § 983(a)(1)(A) of the seizures and its intent to administratively forfeit the Property to all known interested parties, including to Michael Bennett.

4. Michael Bennett ("Claimant") filed claims in the administrative forfeiture proceeding with DEA as to the Property. No other person has filed a claim to the Property in the administrative forfeiture proceedings.

5. DEA referred the administrative claims to the United States Attorney's Office for civil judicial forfeiture proceedings.

6. Pursuant to 18 U.S.C. § 983(a)(3)(A), the earliest deadline for the United States to file a complaint for forfeiture against the Property or include the Property for forfeiture in a criminal action is **January 13, 2025**.

7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline for the Property set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Property.

8. The Claimant knowingly, intelligently, and voluntarily gives up any right he may have under 18 U.S.C. § 983(a)(3)(A) and (B) to require the United States to file a complaint for forfeiture against the Property, to return the Property, and/or to include the Property for forfeiture in a criminal action by **January 13, 2025**.

9. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Property, return the Property, and/or to include the Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **120 days** from **January 13, 2025** to and including **May 13, 2025**.

10. The Claimant waives all constitutional and statutory challenges related to the foregoing extension and gives up any right he may have to seek

dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. The Claimant further waives and agree to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

11. The Claimant agrees that until the United States files a complaint for forfeiture against the Property and/or alleges forfeiture of the Property in a criminal action, or until **May 13, 2025**, whichever occurs first, the Property shall remain in the custody of the United States and Claimant shall not seek its return for any reason in any manner.

12. By signing below, Steven Fishman declares that prior to signing this Stipulation, he provided a copy of it to the Claimant, Michael Bennett, reviewed it with him, consulted with him regarding its contents, answered any questions Claimant had about it, determined that Claimant understands its terms and is aware of his rights in this matter, and Claimant authorized his counsel, Steven Fishman, to sign this Stipulation.

13. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

**IT IS SO ORDERED.**

s/Susan K. DeClercq  
United States District Court Judge

Date: January 6, 2025

Approved as to form and substance:

Dawn N. Ison  
United States Attorney

/s/Kelly Fasbinder  
Kelly Fasbinder (P80109)  
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Dated: January 3, 2025

/s/Steven Fishman (with consent)  
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Dated: January 3, 2025